

## U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 9, 2022

## **BY ECF**

Honorable Jesse M. Furman United States District Judge Southern District of New York New York, New York 10007

Re: United States v. Sakoya Blackwood, 22 Cr. 460 (JMF)

Dear Judge Furman:

Please find enclosed a proposed protective order, which the parties have already executed. The Government submits that the proposed protective order is appropriate under Rule 16(d)(1) because the Government anticipates that the discovery materials will include, among other things: (1) materials that refer to victims and/or witnesses relating to an ongoing investigation; and (2) materials, including sexually explicit materials, that affect the privacy and confidentiality of other individuals.

Respectfully submitted,

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cc: Counsel of Record